



Application GRANTED. Defendants shall answer, move or otherwise respond to the complaints by **November 29, 2022**.

October 7, 2022

Dated: October 11, 2022  
New York, New York

BY ECF

The Honorable Lorna G. Schofield  
United States District Judge for the  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, New York 10007

A handwritten signature in black ink, appearing to read "L. G. Schofield", is written over a horizontal line. Below the line, the name "LORNA G. SCHOFIELD" is printed in a bold, sans-serif font, followed by "UNITED STATES DISTRICT JUDGE" in a similar font.

LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE

**RE: Consent Motion For Extension Of Time To File Answers To Complaints, *King v. Habib Bank Ltd.*, No. 20-cv-4322-LGS; *Border v. Habib Bank Ltd.*, No. 21-cv-6044-LGS; *Alexander v. Habib Bank Ltd.*, No. 21-cv-2351-LGS (“*King et al.*”).**

Dear Judge Schofield,

With the consent of Plaintiffs in this action, and pursuant to Rule I.B.2. of the Court’s Individual Rules and Procedures for Civil Cases, Defendant Habib Bank Ltd. (“HBL”) respectfully moves for an extension of time to file its answers to the three Complaints in *King et al.* HBL’s answers are currently due October 12, 2022, pursuant to Fed. R. Civ P. 12(a)(4)(A). HBL respectfully requests that the Court grant an extension of HBL’s answer date until November 29, 2022. This is Defendants’ first request for an extension of time.

On September 28, 2022, the Court granted in part and denied in part HBL’s motion to dismiss, and ordered the parties to meet and confer and file a proposed civil case management plan and scheduling order by October 19, 2022. *See* Opinion and Order (Dkt. 56). The requested extension will not adversely impact that filing.

There is good cause for the Court to grant this extension. The three Complaints collectively contain 647 pages of allegations that require further investigation and analysis by HBL. Additionally, the parties are undertaking discussions about the proposed case management plan and scheduling order due October 19. The requested extension will allow the parties to address HBL’s proposal to defer substantive responses to the Complaints until after the completion of jurisdictional discovery and the filing of HBL’s renewed motion to dismiss for lack of jurisdiction as allowed by the Court. *See* Opinion and Order (Dkt. 56) at 7-8, 24.

For the foregoing reasons, and with Plaintiffs’ consent, HBL respectfully moves that the time to file its answers to the Complaints be extended to and through November 29, 2022.

Respectfully submitted,

/s/ Mitchell R. Berger  
Mitchell R. Berger (MB-4112)

Squire Patton Boggs (US) LLP

October 7, 2022

**BY ECF**

Alexandra E. Chopin (AC-2008)  
Benjamin D. Wood (*Pro Hac Vice*)

SQUIRE PATTON BOGGS (US) LLP  
1211 Avenue of the Americas, 26th Floor  
New York, New York 10036

2550 M Street, N.W.  
Washington, D.C. 20037

t: (202) 457-6000

f: (202) 457-6315

[mitchell.berger@squirepb.com](mailto:mitchell.berger@squirepb.com)

[alexandra.chopin@squirepb.com](mailto:alexandra.chopin@squirepb.com)

[benjamin.wood@squirepb.com](mailto:benjamin.wood@squirepb.com)

*Counsel for Defendant Habib Bank Limited*